

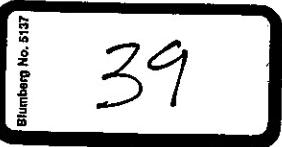
DEPOSITION OF BOBBY E. ABRAMS, JR.

January 24, 2006

Pages 1 through 75

**CONDENSED TRANSCRIPT AND CONCORDANCE
PREPARED BY:**

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January 24, 2006

Deposition of Bobby E. Abrams, Jr.

Lowe vs. MCBOE

Page 1

Page 3

1 IN THE UNITED STATES DISTRICT COURT
 2 FOR THE MIDDLE DISTRICT OF ALABAMA
 3 NORTHERN DIVISION

4
 5 MELVIN LOWE,
 6 Plaintiff/Petitioner,
 7 Vs. CIVIL ACTION NO.
 2:05-CV-0495

8 MONTGOMERY COUNTY BOARD
 9 OF EDUCATION,
 10 Defendant/Respondent.

11 *****
 12

13 DEPOSITION OF BOBBY E. ABRAMS, JR., taken
 14 pursuant to stipulation and agreement before
 15 Patricia G. Starkie, Registered Diplomate Reporter,
 16 CRR, and Commissioner for the State of Alabama at
 17 Large, in the Law Offices of Hill, Hill, Carter,
 18 Franco, Cole & Black, 425 South Perry Street,
 19 Montgomery, Alabama, on Tuesday, January 24, 2006,
 20 commencing at approximately 11:25 a.m.

21 *****
 22

1 APPEARANCES
 2

3 FOR THE PLAINTIFF:

4 William F. Patty, Esq.
 5 Tanya E. Dugas, Esq.
 BEERS, ANDERSON, JACKSON
 PATTY & VAN HEEST
 Attorneys at Law
 6 250 Commerce Street
 Montgomery, Alabama

7 FOR THE DEFENDANT:

8 Elizabeth B. Carter, Esq.
 HILL, HILL, CARTER, FRANCO
 COLE & BLACK
 Attorneys at Law
 425 South Perry Street
 11 Montgomery, Alabama
 ALSO PRESENT:
 13 Mr. Melvin Lowe
 Mr. Jimmy Barker

14 *****

15 EXAMINATION INDEX

16 BOBBY E. ABRAMS, JR.
 17 BY MS. DUGAS 4.

20 *****

21 (No exhibits were marked to this deposition)

Page 2

Page 4

1 the waiving of the filing of the same.

2 It is further stipulated and agreed by and
 3 between the parties hereto and the witness that the
 4 signature of the witness to this deposition is
 5 hereby waived.

6 *****

7 BOBBY E. ABRAMS, JR.,

8 The witness, after having first been duly
 9 sworn to speak the truth, the whole truth and
 10 nothing but the truth testified as follows:

11 EXAMINATION

12 BY MS. DUGAS:

13 Q. Mr. Abrams, I'm Tanya Dugas, representing
 14 Mr. Lowe.

15 Could you tell us your name, please.

16 A. Bobby E. Abrams, Jr.

17 Q. And Mr. Abrams, what is your address?

18 A. 1470 Pampas, Montgomery, Alabama 36117.

19 Q. And what is your date of birth, please?

20 A. 4/12/67.

21 Q. And your social security number?

22 A. 366-90-0449.

23 Q. Are you married?

1 (Pages 1 to 4)

	Page 5		Page 7
1	A. Yes.	1	central Alabama?
2	Q. And what is your wife's name?	2	A. My mother is here. My sister is here in
3	A. Stephanie.	3	Montgomery.
4	Q. Do you have any children over the age of	4	Q. What's the last names for your mother and
5	19?	5	sister?
6	A. No.	6	A. Abrams.
7	Q. Do you have any children?	7	Q. Your sister as well?
8	A. Three.	8	A. Yes.
9	Q. And what is your educational background?	9	Q. And I know that you said you got your
10	A. I received my bachelor's from the	10	teaching certificate in Michigan in 1990.
11	University of Michigan in general studies.	11	Do you currently hold an Alabama teaching
12	Also received my teaching certification	12	certificate?
13	from the University of Michigan in 1990. I	13	A. Yes.
14	received my master's in education	14	Q. When did you receive that?
15	administration from Alabama State, and I'm	15	A. '97.
16	currently finishing up on my EDS degree,	16	Q. And I take it when you got your master's in
17	educational specialist degree, in	17	administration, you received an
18	administration from Alabama State.	18	administrative certificate?
19	Q. Okay. When did you receive your master's	19	A. Yes.
20	in administration?	20	Q. That was 2001?
21	A. I think it was 2000. 2001.	21	A. Yes.
22	Q. Okay. And you said you're currently	22	Q. Do you hold any other certificates?
23	working on your EDS?	23	A. No.
1	A. Finishing up, yes.	1	Q. Okay. And other than Michigan, is there
2	Q. When will you finish that?	2	any other state that you hold --
3	A. Hopefully, a year ago. I'm actually	3	Is your Michigan certificate current?
4	talking with Dr. Stewart, a professor at	4	A. It's not current. It lapsed, I guess, in
5	the school now, and trying to work	5	'97 when I transferred everything to
6	something out so I can go ahead and finish	6	Alabama.
7	this term, by May of '06.	7	Q. Do you hold any teaching certificates in
8	Q. Okay. Have you ever given any deposition	8	any other states other than Alabama?
9	testimony before?	9	A. No.
10	A. Not like this, no. Not where I had to	10	Q. Could you tell us a little about your
11	swear in, so I guess no, I haven't.	11	employment history, please.
12	Q. Okay. Have you ever been sued?	12	A. I started teaching in '97 at
13	A. No.	13	Southside-Selma, Southside High School,
14	Q. Have you ever sued anyone?	14	where I taught history and coached football
15	A. No.	15	there for three years. After being in
16	Q. Were you in the military?	16	Selma, I left and I went to Tallahassee, and
17	A. No.	17	I taught history and coached football there
18	Q. Have you ever been arrested?	18	at Tallahassee High School for two years.
19	A. Yes.	19	Q. So you would have gone to Tallahassee --
20	Q. What's the charge?	20	You were at Selma from '97 to 2000?
21	A. I received a DUI in Georgia, I want to say.	21	A. 2000.
22	'94, '95.	22	Q. And then you left Tallahassee in --
23	Q. Okay. Do you have any relatives in south	23	A. I was in Tallahassee at the high school for

Page 17

Page 19

1 go through the same way as any position.
 2 Her title is not reading coach or reading
 3 teacher. Her title is lead teacher and her
 4 funds are paid through Title I funds that
 5 we receive.

6 Q. Okay.

7 A. It just so happens that that's -- because
 8 of her interaction with the New Century
 9 lab, and that's a reading and math remedial
 10 program, she was trained to work that
 11 program. She also helps with direct
 12 instruction.

13 Q. Okay. Do you know, just as a principal,
 14 what the process would be if you were to --
 15 if the reading coach hiring process is
 16 different from, let's say, hiring a teacher
 17 for the school?

18 MS. CARTER: Object to the form.

19 You can answer when I say
 20 that.

21 THE WITNESS: Say again?

22 MS. CARTER: You can answer the
 23 question.

1 position open, the job would be posted?

2 A. Right.

3 Q. Once the job is posted, applications would
 4 go to --

5 A. Central office.

6 Q. -- central office?

7 A. Right.

8 Q. Are you of the opinion that someone at
 9 central office does an interview of these
 10 applicants before you find out who they are?

11 A. I would think that someone in central
 12 office would talk to them, make sure the
 13 application is straight. I know they have
 14 to do the fingerprints and the whole -- the
 15 whole process.

16 Q. Okay. So all of this is done before the
 17 teacher would get to you, before you would
 18 interview?

19 A. Yes.

20 Q. Okay. What would happen after you
 21 interview this individual? What's the next
 22 step?

23 A. After I --

Page 18

Page 20

1 A. I would think it would be an ordinary
 2 process. You would advertise the position,
 3 people would fill out the application,
 4 people would be called in on the interview,
 5 and a list would go out to the principal,
 6 hey, we've interviewed this many people.
 7 If you need a reading coach, here's a
 8 reading coach list or a science teacher
 9 list or a special education list. And from
 10 that list, principals would call those
 11 people in and interview them.

12 Q. Now, for teachers, does the central office
 13 interview prior to the principal
 14 interviewing the candidates?

15 A. I believe there is a screening, a question
 16 and answer period that the teachers go
 17 through. The list that we receive, I'm of
 18 the opinion that everyone on here on this
 19 list is qualified to teach and everyone on
 20 this list can be interviewed for that
 21 particular position.

22 Q. Okay. So for a teacher position at McKee,
 23 and, say, you've got a math teacher

1 MS. CARTER: Are we still on
 2 hiring a reading coach?

3 MS. DUGAS: Just hiring a
 4 teacher. No, we're talking
 5 about, I think, a math
 6 teacher.

7 A. I would go through an interview process,
 8 run through my ten questions, make a
 9 decision on that person. If that person
 10 was one I wanted to recommend, I would
 11 e-mail Mr. Barker my recommendation for
 12 that teacher. I believe then someone in
 13 central office would either contact that
 14 person or I would contact that person and
 15 say, report down to central office to fill
 16 out more paperwork, sign -- I guess to
 17 actually sign a contract, so forth.

18 Q. Okay. Now, after you've done the interview
 19 process for the teachers, do you narrow it
 20 down to one candidate that you would like
 21 to fill that position?

22 A. Ultimately, yes. Sometimes if I have an
 23 interview panel, we ask for the top three

Page 37

1 was Carolyn Hicks who gave me the number or
 2 Sue Averant. They gave me the number.
 3 Q. Do you know if either of these people had
 4 gone through the central office prior to
 5 your interviewing them?
 6 A. I would think that they have an application
 7 on file.
 8 Q. But do you know one way or the other?
 9 A. Well, they have an application on file --
 10 Q. Okay.
 11 A. -- with the school system, so...
 12 Q. Okay. You stated one of these people
 13 called you?
 14 A. Right.
 15 Q. Was that after they had completed --
 16 submitted an application to central office?
 17 A. I would think, yes. When I interviewed
 18 them, I was told by them that they have an
 19 application on file and they are certified
 20 and taken all that information. I really
 21 wouldn't know unless I recommended one for
 22 the position and then the checks were done
 23 at the central office. Maybe it will come

Page 39

1 Q. Okay. Have you considered -- is Melvin
 2 Lowe's name on this list that you -- for
 3 the second position?
 4 A. I don't think that Melvin Lowe's name is on
 5 the list that I have.
 6 Q. Okay. I know that you stated that you and
 7 Mr. Lowe had classes together and are
 8 friends. Are you aware that his doctorate
 9 was focused on special education?
 10 A. No.
 11 Q. Have you had any conversations with
 12 Mr. Barker about Melvin Lowe?
 13 MS. CARTER: Object to the form.
 14 A. Not other than what I've stated, asking --
 15 Q. If Melvin was certified?
 16 A. Right.
 17 Q. And you've never had any more in-depth
 18 conversations with Mr. Lowe?
 19 A. In-depth conversations with Mr. Lowe?
 20 Q. I'm sorry. Strike that.
 21 You never had any other in-depth
 22 conversations with Mr. Barker about Melvin
 23 Lowe?

Page 38

1 back, this person doesn't have a file or
 2 this person doesn't have degrees.
 3 Q. Okay.
 4 A. But I would imagine through the central
 5 office that weeding process has already
 6 been done. So if it's somebody that they
 7 gave me, then they should have or would
 8 have had the information. But the person
 9 that just called me probably called from
 10 hearing about the position through
 11 advertisement or hearsay.
 12 Q. Have you gotten any kind of list from
 13 central office about the applicants who
 14 have expressed interest in this special ed
 15 position that came available in December?
 16 A. No. Just a list that I had at the
 17 beginning of the year.
 18 Q. Was this the list --
 19 A. Special ed list.
 20 Q. Was this the list of applicants who had
 21 expressed interest in the special ed
 22 position for which Melvin Lowe applied?
 23 A. Right.

Page 40

1 A. No.
 2 Q. Did you ever speak to Mr. Barker at a
 3 restaurant one day about Melvin Lowe?
 4 A. Right. That's when I talked to him. When
 5 I asked him about Melvin Lowe and the
 6 special ed position was at lunch when I saw
 7 him at a restaurant.
 8 Q. Did you ever have any other conversations
 9 with him over the phone?
 10 A. No. Mr. Barker?
 11 Q. I'm sorry. Yes, Mr. Barker.
 12 A. No.
 13 Q. Have you ever had any conversations with
 14 Carolyn Hicks about Melvin Lowe?
 15 A. No.
 16 Q. Have you ever had a conversation about
 17 Carolyn Hicks -- did you ever speak to
 18 Carolyn Hicks about the administrative
 19 position?
 20 A. No.
 21 Q. Was there ever a time when Carolyn Hicks
 22 told you that Melvin Lowe had changed his
 23 mind with regard to interest in a position

Page 49

Page 51

- 1 A. Any candidate will contact me, I would send
 2 them down to the central office to make
 3 sure they have an application and went
 4 through the paperwork, the initial process.
 5 Q. Okay.
 6 A. So --
 7 Q. Is there an interview process at the
 8 central office prior to you speaking to the
 9 candidates?
 10 A. I would think that -- There is something
 11 in the summertime. I would think that
 12 someone in the staff talks with central
 13 office personnel. I don't know. If
 14 someone called me tomorrow for that special
 15 ed position that I have, I would send them
 16 down to the board to make sure they have
 17 the paperwork. I don't think that they
 18 would go through an interview process at
 19 the board first. I think that they would
 20 just check to see if they have the
 21 paperwork in and --
 22 Q. That's where my confusion was. I thought
 23 you had said earlier that there was an

- 1 but not certified, working on
 2 certification, or possibly this one is
 3 nonrenewed. That type of information is
 4 also provided. So that led me to believe
 5 that the candidates at some point talked
 6 with central office personnel.
 7 Q. Okay. Now, the list that you get from HR,
 8 what information is included on this list?
 9 A. Name, telephone number, degree. Then,
 10 again, on the end, if they were
 11 nonrenewed -- a nonrenewed teacher. I
 12 think that's given. If they interviewed
 13 well, I think that information is on
 14 there. I think -- and I can't remember
 15 what symbols or numbers or the actual
 16 wording of it.
 17 Q. Okay.
 18 A. But a category that they were placed in,
 19 number one, two, or three. But it was
 20 helpful to principals to see that
 21 information so that we know, okay, this is
 22 a strong candidate according to our central
 23 office, or this one is certified in

Page 50

Page 52

- 1 interview at the board. Is there?
 2 MS. CARTER: Object to the form.
 3 Q. Is there an interview at the board when
 4 someone first comes in? Not at the board.
 5 Well, at the human resources.
 6 A. I would think in the screening process that
 7 the human resource department -- and I
 8 think much of that may be done in the
 9 summertime. That screening process may
 10 entail looking at the applications. But
 11 some way, somehow, the actual list that we
 12 get is formed for principals to look at at
 13 the beginning of each summer of the
 14 applicants. I would think that in the
 15 process of that, some of them may talk to
 16 central office personnel just to clarify
 17 some things.
 18 They may interview through -- I think
 19 there's a code on the end of each name
 20 where candidates have been interviewed,
 21 where this one interviewed with us well or
 22 this one didn't interview well but is on
 23 the list or this one is highly qualified

- 1 whatever area. It may be science, but I'm
 2 biology certified or I'm chemistry
 3 certified. So that type of information is
 4 on that list.
 5 Q. So the people on the list are separated
 6 based on their teaching specialties? Is it
 7 divided up by science teacher or by
 8 certification?
 9 A. Just science teacher, math teacher, English
 10 teacher, special ed teacher, so forth.
 11 Q. And on this form, there's a ranking of the
 12 candidates?
 13 A. Not all of them will have a ranking. Just
 14 as much information as the central office
 15 can give us about them to kind of help us
 16 make a decision in making calls to the
 17 people.
 18 Q. When you get this list, do you ever call
 19 central office to check up on people who
 20 don't have a ranking or to get additional
 21 information for anybody on that list prior
 22 to an interview?
 23 A. No. If they're on the list, I just try to

	Page 61		Page 63
1	degrees does she have?	1	conducting this hiring for the
2	A. I believe she has a math degree. I believe	2	administrative assistant position, did you
3	she's certified as a math teacher at	3	have any discussions with Mr. Barker or
4	Brewbaker. I believe she has a master's in	4	anybody at central office that we haven't
5	administration.	5	talked about already about the position
6	Q. Do you know if she has her Alabama	6	itself?
7	administrative certificate?	7	A. No. The only question -- the only
8	A. Alabama --	8	conversations I had, again, with Mr. Barker
9	Q. Like the state of Alabama administrative	9	was in talking about other people and
10	certificate?	10	trying to get advice on establishing a
11	A. Yes. Yes.	11	team.
12	Q. Do you know when she acquired the	12	Q. What kind of advice did he give you as far
13	administrative certificate?	13	as establishing a team?
14	A. I'm not sure.	14	A. You know, other than just going through the
15	Q. Okay. Do you know if it was within the	15	normal hiring process.
16	last two years or if she's had it for	16	Q. And I guess I'm not that familiar with the
17	several years?	17	school board's hiring process, so that's
18	A. It was before she was hired.	18	why -- what kind of advice did he give you
19	Q. Okay. Was it before she was interviewed	19	as a new principal when you were
20	for the position?	20	establishing your team for this position?
21	A. I'm not sure. I would imagine that	21	A. Right. Again, other than the normal hiring
22	everyone that was interviewed for the	22	process. Nothing out of the ordinary I
23	position had their degrees and	23	could say or I would say. Simple
	Page 62		Page 64
1	certifications.	1	conversations about, you know, number of
2	Q. Okay.	2	teachers that you need and -- you know, I
3	A. And that was done I would imagine through	3	can't pinpoint an exact quote or anything,
4	the central office.	4	but it was -- it was nothing out of the
5	Q. Had she had any previous administrative	5	ordinary. Talking about being a new
6	experience?	6	principal and having a staff, hiring
7	A. No.	7	teachers and the number of staff members
8	Q. What was her previous experience prior to	8	that I had there at the school; numbers of
9	coming to McKee?	9	students at the school, different positions
10	A. I believe she was a math teacher at	10	at the school. Just trying to get a feel
11	Brewbaker.	11	for what was there before I got there, you
12	Q. Do you know how long she taught math at	12	know.
13	Brewbaker?	13	Q. And I know that Mr. Barker is very familiar
14	A. I'm not sure. I believe she was a tenured	14	with all of the employees in his system.
15	teacher. I think she spent some years in	15	A. Right.
16	Florida as a teacher. I know, but I don't	16	Q. Did y'all have any discussions as far as
17	know right offhand. I have it written	17	the personalities of your teachers or the
18	down.	18	dynamics of McKee and what types of people
19	Q. About how long has she been in the school	19	would fit into that to make the school run
20	system, do you know, whether Alabama or	20	well or --
21	Florida?	21	A. No. Ms. Green had left me a list of
22	A. I would think at least four or five years.	22	personality traits of the teachers, so I
23	Q. Okay. And when you were in the process of	23	was familiar with that. You know, if it

Deposition of Bobby E. Abrams, Jr.

Lowe vs. MCBOE

Page 65

1 was a situation where I needed to consult
 2 with Mr. Barker, for example, a teacher
 3 being late, constantly being late, a
 4 teacher not doing lesson plans and so
 5 forth, I could consult with Mr. Barker on
 6 that. But much of, again, the personality
 7 information I received from Ms. Green and
 8 another -- a woman that was there before I
 9 got there who was leaving who was serving
 10 as SIA or education specialist, curriculum
 11 specialist.

12 Q. Okay. Now, when you talked to Mr. Barker
 13 about the administrative assistant position
 14 with regard to Melvin, when you asked him
 15 about Melvin Lowe specifically, and you --
 16 you said you called him and threw out
 17 Melvin's name to him. Was his only
 18 reaction that Melvin was qualified?

19 A. Pretty much.

20 I actually went in and talked to him.
 21 We didn't talk on the phone about it. It
 22 was -- I went in and saw him.

23 Q. Okay.

Page 67

1 about him?

2 A. Well, considering the possibility of hiring
 3 him, yes.

4 Q. Okay. And what changed whereas Melvin Lowe
 5 did not get an interview, a follow-up
 6 interview with you?

7 A. Again, the fact that the people that --
 8 when I sat in on the interview, people that
 9 I talked -- that talked to us, those four
 10 people that I called back for a second
 11 interview I felt would serve my
 12 administration, our administration at McKee
 13 Junior High School better.

14 Q. Okay. And did you go back and -- with each
 15 candidate and ask Mr. Barker his input on
 16 the other candidates that you thought were
 17 possibilities for the position?

18 A. No.

19 Q. Okay.

20 MS. CARTER: I'm going to have to
 21 take a break.

22 (Brief recess.)

23 Q. (Ms. Dugas continuing) Did you ever tell

Page 66

Page 68

1 A. Talked about some other things.

2 Yes. He was certified, qualified, you
 3 know. I felt potentially that it could be
 4 a working situation, again, just throwing
 5 the names out, you know. I had talked to
 6 him about Dr. McCorvey, who is still there,
 7 and just talking about people in general,
 8 the possibility of people.

9 Q. And you said basically, all he told you was
 10 that -- I don't know that basically was the
 11 word that you used -- that Melvin was
 12 qualified. And you spoke to him because
 13 you saw a possibility?

14 A. Right.

15 Q. Did your seeing a possibility with hiring
 16 Melvin Lowe change based on your
 17 discussions that you had with Mr. Barker?

18 A. No. No.

19 Q. So were you ever considering hiring Melvin
 20 Lowe for this position?

21 A. Yes.

22 Q. Were you considering hiring Melvin Lowe for
 23 the position when you asked Mr. Barker

1 Melvin Lowe that you couldn't hire him
 2 because you were told that you had to hire
 3 a female?

4 A. No.

5 Q. I know that you and Mr. Lowe are friends.

6 A. Uh-huh (positive response).

7 Q. Did you ever tell him somewhere along the
 8 line during conversations why he wasn't
 9 hired for this position?

10 A. No.

11 Q. Did it ever come up in conversation?

12 A. I don't think that it did. I know that we
 13 didn't talk about it after the interview.

14 Q. Okay.

15 A. No.

16 Q. Okay. So you never discussed these
 17 positions following the interview?

18 A. Other than I'm, you know, going a different
 19 route and I'm talking to some people and
 20 that he wasn't going to be the one that I
 21 hired.

22 Q. So you gave -- you gave him a heads up that
 23 you were looking toward some other

17 (Pages 65 to 68)

Page 69	Page 71
1 candidates? 2 A. Right. We did talk about that. 3 Q. Okay. And did you give him any kind of 4 reason as to why you were going with these 5 other candidates? 6 MS. CARTER: Object to the form. 7 A. No. 8 Q. Okay. Did he ask you why you were not 9 following up with him or considering him 10 for the position? 11 A. No. I think the impression that I got from 12 Mr. Lowe, that he may have been bitter or 13 angry. Not at myself, but at people in the 14 central office. Other than that... 15 Q. And what gave you that impression? 16 A. Again, in the conversations that we have 17 had in the past, I just felt that Mr. Lowe 18 felt that the central office was out to get 19 him. That necessarily wasn't the case in 20 our situation, but that's the impression 21 that I got from him. And, again, what I've 22 always said to him is, you know, 23 something's going to come up. I'm going to	1 Melvin Lowe? 2 A. No. 3 Q. For the other three teachers that -- other 4 three candidates -- we've already talked 5 about Sonia Floyd. 6 A. Uh-huh (positive response). 7 Q. What was their certification and education? 8 A. I believe their certification was 9 administration certification -- 10 Q. And -- 11 A. -- and certificate, yes. 12 Q. Let me make sure we've got it. LaMetra 13 James? 14 A. Yes. 15 Q. Okay. And did she have administrative 16 certification? 17 A. Yes. 18 Q. And do you know what her educational level 19 was? 20 A. You mean her background? 21 Q. Whether she had a master's or bachelor's. 22 A. Master's. 23 Q. Okay. Had she had any previous experience
1 keep my eyes and ears open. I'll call you 2 and let you know if something does come 3 up. I think that's the extent of that. 4 Again, that's just my impression that I 5 received, that I got from Mr. Lowe. 6 Q. And this impression was based solely on 7 your conversations with -- 8 A. Based solely on conversations -- 9 MS. CARTER: I know you're both 10 talking, but let her finish 11 her question. 12 A. I'm sorry. 13 Q. And this impression was based solely upon 14 conversations that you had with Melvin 15 Lowe? 16 A. Yes. 17 Q. Did you ever tell Melvin Lowe anything that 18 would give him the impression that central 19 office was blocking his appointment? 20 A. No. 21 Q. Are you aware personally of any negative 22 feelings that anyone from the board or 23 human resources or Mr. Barker may have for	1 in administration? 2 A. I don't think so. 3 Q. Okay. Was she at the time a classroom 4 teacher? 5 A. I thought she was math. She was hired by 6 the system as a math coach. 7 Q. Okay. 8 A. And that's the job she has now, so I'm of 9 the impression that she had some sort of 10 math background. 11 Q. Okay. And Roderick Jones? Was that -- 12 A. James. 13 Q. James. I can barely read my handwriting. 14 A. I believe he had his master's in 15 administration. I believe he had some 16 experience. 17 Q. And Melissa Williams was the third person? 18 A. Yes. 19 Q. And did she have an administrative 20 certificate? 21 A. Yes. 22 Q. Do you know what her educational background 23 was?